

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE
PLAINTIFFS' SUPPLEMENTAL EXPERT REPORTS AND OPINIONS**

PLAINTIFFS' EXHIBIT 4

March 16, 2020 Email From Plaintiffs' Counsel to Defendants' Counsel

Friday, July 31, 2020 at 09:03:45 Central Daylight Time

Subject: Holloway v. Virginia Beach - Plaintiffs' Supplemental Expert Reports

Date: Monday, March 16, 2020 at 1:19:22 PM Central Daylight Time

From: Annabelle Harless <aharless@campaignlegalcenter.org>

To: Christopher S. Boynton <CBoynton@vbgov.com>, Joseph M. Kurt <jKurt@vbgov.com>, Gerald L. Harris <GLHarris@vbgov.com>, Mark Stiles <MStiles@vbgov.com>

CC: Gerry Hebert <ghebert@campaignlegalcenter.org>, Christopher Lamar <CLamar@campaignlegalcenter.org>, Ruth Greenwood <rgreenwood@campaignlegalcenter.org>, Danielle Lang <dlang@campaignlegalcenter.org>, Jeff Zalesin <jzalesin@campaignlegalcenter.org>, Simone Leeper <SLeeper@campaignlegalcenter.org>

Counsel,

Pursuant to Federal Rule of Civil Procedure 26(e)(2), we are providing you with supplemental expert reports from two of our experts, Anthony Fairfax and Douglas Spencer. As Gerry Hebert mentioned over the phone last week, we can work with you to schedule supplemental depositions if necessary.

The supplemental reports and data are available to download at this dropbox link:

<https://www.dropbox.com/sh/iqfi1njzxlfp06/AADAcTkJFjeevp9B5Q6-nDeia?dl=0>

The password is Holloway. The link will expire in 7 days. Please let me know if you have any difficulty accessing the link.

Best,

Annabelle

Annabelle Harless

Senior Legal Counsel, Voting Rights & Redistricting

O: 312.312.2885 C: 810.701.5029 | [@a_harless](#)

Campaign Legal Center

55 W. Monroe Street, Suite 1925

Chicago, IL 60603

campaignlegalcenter.org

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